

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

**This Document Relates to:**

*County of Webb, Texas v. Purdue Pharma,  
L.P. et al, Case No. 1:18-op-45175-DAP (N.D.  
Ohio)*

**MDL No. 2804**

**Case No. 17-MD-2804-DAP**

**Judge Dan Aaron Polster**

**PLAINTIFF'S MOTION FOR LEAVE TO FILE EXHIBIT UNDER SEAL**

Pursuant to Local Rule 5.2, Plaintiff seeks leave to file Exhibit A to Plaintiff's Consolidated Motion for Leave From Moratorium On Substantive Filings to: (1) Permit Motion to Sever Non-PBM Defendants from Claims Against PBM Defendants Express Scripts and Optum, and (2) Permit Amendment of its Complaint ("Motion for Leave") under seal.

Local Rule 5.2 states: "No document will be accepted for filing under seal unless a statute, court rule, or prior court order authorizes the filing of sealed documents."

Plaintiff has attached as Exhibit A to its Motion for Leave its proposed Third Amended Complaint.

Plaintiff's Third Amended Complaint contains information that has been subject to Protective and Confidentiality Orders, including Case Management Order No. 2 and the amendments thereto (ECF #s 441, 1357, 2687, 2688). This information is subject to this Court's Order Amending Procedures Regarding Redactions and Filing of Briefs Under Seal (ECF # 1813).

Plaintiff respectfully requests to proceed in this manner so there are no inadvertent disclosures of information subject to Protective Orders and to comply with this Court's orders.

WHEREFORE, Plaintiff respectfully requests the Honorable Court to grant Plaintiff's Motion for Leave to File its Exhibit Under Seal.

Dated: January 24, 2023

/s/ Joanne M. Cicala

**THE CICALA LAW FIRM PLLC**

Joanne M. Cicala  
Josh Wackerly  
R. Johan Conrod, Jr.  
Cristina Moreno  
Shelbi Flood  
101 College Street  
Dripping Springs, TX 78620  
[joanne@cicalapllc.com](mailto:joanne@cicalapllc.com)  
[johan@cicalapllc.com](mailto:johan@cicalapllc.com)  
[josh@cicalapllc.com](mailto:josh@cicalapllc.com)  
[cristina@cicalapllc.com](mailto:cristina@cicalapllc.com)  
[shelbi@cicalapllc.com](mailto:shelbi@cicalapllc.com)  
Tel.: (512) 275-6550  
Fax: (512) 858-1801

**SANFORD HEISLER SHARP, LLP**

Kevin Sharp  
Christine Dunn  
[ksharp@sanfordheisler.com](mailto:ksharp@sanfordheisler.com)  
[cdunn@sanfordheisler.com](mailto:cdunn@sanfordheisler.com)  
611 Commerce Street, Suite 3100  
Nashville, Tennessee 37203  
Tel: (615) 434-7000  
Fax: (615) 434-7020

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 24, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record at their e-mail addresses on file with the Court.

/s/ Joanne M. Cicala  
Joanne M. Cicala